



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

VIA UPS

DEC - 5 2016

Mr. Kevinn Kramer  
QA/QC Supervisor  
Vertellus Specialties, Inc.  
Route 611 (P.O. Box 730)  
Delaware Water Gap, PA 18329

Re: Request for Information Pursuant to Section 3007(a) of the Resource Conservation and Recovery Act, 42 U.S.C. § 6927(a), Regarding Generation and Management of Hazardous Waste by Vertellus Specialties, Inc.

**Information Request - Reference No. C17-006**  
**EPA ID No. PAD003037504**

Dear Mr. Kramer:

The U.S. Environmental Protection Agency, Region III ("EPA") is requesting information to supplement the information obtained during its inspection of the Vertellus Specialties, Inc. facility ("VSI" or "the Facility") located in Delaware Water Gap, PA on August 17, 2016. EPA is requesting this information pursuant to the authority granted to it under Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927(a), which provides in relevant part that "any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, . . . furnish information relating to such wastes . . . ." EPA hereby requires that you furnish to EPA, within **thirty (30) calendar days** of receipt of this letter, the information requested below, including all documents responsive to such request.

For each and every request, if you have any reason to believe that there may be a person(s) who may be able to provide a more detailed or complete response to such request or may be able to provide additional responsive documents, then as a part of your response to such request, identify each such person and the additional information or documents which such person may be able to provide. Furthermore, for each and every response, if information or documents responsive to such request are not in your possession, custody or control, then as part of your response to such request, identify each person from whom such information or documents may be obtained.

Please provide a separate narrative response to each information request. Precede each

answer with the number of the question or letter of the subpart of the request to which it corresponds. A request for documents shall be construed as a request for any and all documents maintained by you or in your custody, control, or possession or in the possession, custody or control of any of your employees or agents, relating to the matters described below. All copies of documents submitted to EPA in response to the following requests must be complete and legible.

As used herein, the term "document" means: writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or daily entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phonograph records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer print outs, or other data compilations from which information can be obtained or translated.

All other terms used in this request for information that are defined in RCRA, 42 U.S.C. §§ 6901 *et seq.*, or 40 C.F.R. Parts 260-266 and 268 shall have the meanings set forth therein.

#### Requested Information

1. During the August 17, 2016 EPA inspection, the EPA inspectors observed sixteen (16) 5-gallon containers located in the Oil Room. Please refer to Photo #7 of the Compliance Evaluation Inspection ("CEI") report included as Attachment A. With respect to each of the containers, please provide the following information:
  - a. Provide a detailed description of the process or processes that generated the content of the container, and please provide a detailed description of its content.
  - b. Provide the date on which the content(s) of the container was generated and state the basis of your knowledge. If an exact date cannot be determined, please estimate the generation month and year.
  - c. Provide the date on which the content(s) of the container was first placed into the container and state the basis of your knowledge. If an exact date cannot be determined, estimate the month and year, and explain the basis for such an estimate. State the amount (weight and volume) of material in the container at the time of the EPA CEI.
  - d. State the volume of the container.
  - e. State whether or not a "waste determination" and "LDR determination" were made for the content of the container.



- f. If a “waste determination” was made for the content of the container, state whether the waste determination was based on analytic results or on the generator’s knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator’s knowledge, provide a narrative explanation of the scientific basis for each such determination, and provide any supporting documentation.
  - g. Was the content in this container determined to be “hazardous waste?” If so, please state the specific EPA Hazardous Waste Code(s) associated with the content of the container that was determined to be hazardous waste.
  - h. If the content of the container was shipped off-site, submit copies of all bills of lading, manifests (hazardous and non-hazardous), shipping invoices, and LDR notices/certifications that accompanied the off-site shipment of the waste.
  - i. If the content of the container still remains on-site, please state where such contents are currently located within the Facility and how such contents are currently being managed.
2. During the August 17, 2016 EPA CEI of the Oil Room, the EPA inspectors observed a 30-gallon metal black drum that was dated as 7/16/13, and labeled as “Non-RCRA Regulated Waste” and with the words “Waste Oil Drum.” Please refer to Photo #9 of the CEI report included as Attachment A. According to Facility personnel, the drum is used to accumulate spent isopropanol wipes. Please provide the following information regarding the isopropanol wipes accumulated in the 30-gallon container:
- a. Provide a detailed description of the process or processes which generate the solvent wipes at the Facility.
  - b. Provide a detailed narrative explaining how the Facility manages its spent solvent wipes waste stream from the time it is generated until it is shipped off-site for disposal.
  - c. Submit the Safety Data Sheets (“SDSs”) and/or Material Safety Data Sheets (“MSDSs”) for each of the solvent wipe products that are accumulated in the container.
  - d. State whether a “waste determination” and “LDR determination” have been made for each spent solvent wipes.
  - e. If a “waste determination” and “LDR determination” have been made for the Facility’s spent solvent wipes, state when such determinations were made.
  - f. Were any of the Facility’s spent solvent wipes determined to be hazardous waste?

If so, state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste.

- g. If a “waste determination” was made, state whether the determination was based on analytic results or on the generator’s knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator’s knowledge, provide a narrative explanation of the scientific basis for such determination, and provide any supporting documentation.
  - h. If the Facility’s spent solvent wipes waste stream has been shipped off-site, submit copies of all bills of lading, manifests (hazardous and non-hazardous), shipping invoices, and LDR notices/certifications that accompanied each off-site shipment of the waste from January 1, 2013 to the present.
  - i. Provide a detailed description of the process or processes that generated the content(s) of the 30-gallon container, and please provide a detailed description of its content(s).
  - j. State the date on which spent solvent wipes were first placed into the container and state the basis of your knowledge. If an exact date cannot be determined, estimate the generation month and year.
  - k. State the amount (weight and volume) of material in the drum, and state the amount of spent solvent wipes in the drum at the time of the EPA CEI.
  - l. State the date when the drum became full. If an exact date cannot be determined, estimate the month and year.
  - m. State how long it took to fill the drum. If the exact amount of time cannot be determined, estimate how long it took.
  - n. If the content of the 30-gallon drum was shipped off-site, submit copies of all bills of lading, manifests (hazardous and non-hazardous), shipping invoices, and LDR notices/certifications that accompanied each off-site shipment of the waste.
  - o. If the content of the 30-gallon drum remains on-site, please state where such contents are currently located within the Facility and how such contents are currently being managed.
3. During the August 17, 2016 EPA CEI, the EPA inspectors observed a 7,000 gallon tank, which is used by the Facility to accumulate hazardous waste. Please refer to Photo #26 of the CEI report included as Attachment A. Provide the following information regarding each waste stream accumulated in the tank:



- a. A detailed description of the process or processes which generate the hazardous waste(s) accumulated in the tank.
- b. A detailed list of the names, types and amounts of each waste stream accumulated in the tank. State all EPA Hazardous Waste Code(s) (if applicable) and copies of all SDSs, MSDSs, analytical sampling results, and waste profiles relating to the waste(s) going into the tank.
- c. State whether or not a "waste determination" and "LDR determination" was made for each waste stream accumulated in the tank.
- d. If a "waste determination" was made for each waste stream, state whether the waste determination was based on analytic results or on the generator's knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator's knowledge, provide a narrative explanation of the scientific basis for each determination, and provide any supporting documentation.
- e. Were the waste streams accumulated in the tank determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with such waste streams that were determined to be hazardous waste.
- f. State whether a "waste determination" for the volatile organic concentration of each waste stream at its point of waste origination has been made in accordance with 40 C.F.R. § 265.1084.
- g. If a determination for the volatile organic concentration has been made in accordance with 40 C.F.R. § 265.1084 at its point of waste origination, please state when each such determination was made and whether the organic concentration determination was based on analytical results or on the generator's knowledge of the waste or the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If any such determination was based upon the generator's knowledge, provide a narrative explanation of the scientific basis for such determination, and provide any supporting documentation.
- h. State the volatile organic concentration for each waste stream at its point of waste origination.
- i. At the time of the EPA CEI, had the facility implemented emission controls in accordance with 40 C.F.R. § 265.1083 for the tank? If so please describe in detail what controls have been implemented for the tank, and the date the control(s) was implemented. If the facility had not implemented controls for the tank, please state why.

- j. Has the Facility maintained those records required under 40 C.F.R. § 265.1090 for the tank? If so, please state the date on which the Facility began maintaining such records and submit copies of any and all records required under 40 C.F.R. § 265.1090 for the time period of January 1, 2013 up to receipt of this letter.
- k. A detailed schematic of the waste handling systems, including sources, equipment, piping, transfer mechanisms, and all tanks and containers involved in temporary or final collection/management.
- l. A detailed description of all equipment included in the waste handling system, including all pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, flanges or other connectors, closed-vent systems and control devices, as these terms may be defined in 40 C.F.R. § 264.1031.
- m. State whether or not the Facility has conducted an analysis to determine applicability of the Subpart BB regulations to this equipment, as described in 40 C.F.R. § 265.1063(d) and § 265.13(b).
- n. If an applicability determination, as described in 40 C.F.R. § 265.1063(d) and § 265.13(b), had been made for this equipment, state when such a determination(s) was made and the results of such determination(s). Please provide a copy of any and all documentation used to support such a determination.
- o. A detailed list of any and all types and amounts of wastes entering the waste handling systems up to the present time, and the percent organic concentration by weight of each waste. Please include all EPA Hazardous Waste Code(s) (if applicable) and copies of all waste profiles and SDSs and/or MSDSs relating to such waste.
- p. Please state, for all the waste accumulated in the tank at the Facility up to the present time, whether or not any was reclaimed, recycled or reused after such generation. Provide a copy of any and all documentation substantiating such claims of reclamation, recycling, or reuse.
- q. Provide information/documentation that demonstrates whether or not those pieces of equipment listed in response to Question 3.l. above are or are not exempt from the air emission standards for equipment leaks as specified in 40 C.F.R. § 265.1050.
- r. If the Facility has determined that any piece of equipment is exempt, please provide the waste analysis plan, as specified in 40 C.F.R. § 265.1063(d), along with either the sample results or process knowledge documentation upon which the exemption is based.



- s. State whether or not each piece of equipment has been marked in such a manner that it can be distinguished readily from other pieces of equipment in accordance with 40 C.F.R. § 265.1050(c), regardless of whether the Facility is claiming an exemption for any piece of such equipment.
  - t. Please state whether or not any or all of the equipment is "*in light liquid service*" or "*in heavy liquid service*," as defined in 40 C.F.R. § 264.1031. If so, please specify which pieces of equipment are in light liquid service or in heavy liquid service.
  - u. Please state whether or not each piece of equipment has been inspected and monitored under a leak detection and repair ("LDAR") program for the time period of January 1, 2013 up to receipt of this letter.
  - v. Please identify each piece of equipment which has been inspected and monitored under an LDAR program, and provide the time period for which each such piece of equipment has been part of an LDAR program.
  - w. Please submit the Facility's inspection and monitoring schedule for each piece of equipment covered by an LDAR program detailing how often each piece of equipment is visually inspected and/or monitored with an instrument.
  - x. Please submit any and all LDAR program inspection and monitoring records/documentation for each piece of equipment for the time period of January 1, 2013 up to receipt of this letter.
  - y. Has the Facility maintained those records required under 40 C.F.R. §§ 265.1064(b)(1), 265.1064(g) and 265.1064(h)? If so, please state the date on which the Facility began maintaining such records and submit copies of any and all records required under 40 C.F.R. §§ 265.1064(b)(1), 265.1064(g) and 265.1064(h) from the August 17, 2016 EPA CEI up to the present.
4. During the August 17, 2016 EPA CEI, the EPA inspectors observed a 7,000 gallon tank, which is used by the Facility to accumulate hazardous waste. Please refer to Photo #26 of the CEI report included as Attachment A. Please provide the following information regarding the hazardous waste tank:
- a. Indicate the exact date when the hazardous waste tank was installed, and the exact date when VSI first began using the tank for the accumulation of hazardous waste. If an exact date(s) cannot be determined, please estimate the approximate month and year.
  - b. Provide a detailed narrative that explains how the tank and its ancillary equipment (e.g. piping, sumps, piping manifolds, etc.) were installed and constructed.

Submit any and all supporting documentation such as “as-built” drawings, contractor proposals, contractor invoices, etc.

- c. State the exact capacity (m<sup>3</sup>) of the tank.
  - d. Provide a detailed narrative and flow diagram that explains how waste is accumulated into the tank and its ancillary equipment (e.g. piping, sumps, piping manifolds, etc.).
  - e. If it is an “existing tank system” as defined in 40 C.F.R. § 260.10, has the Facility conducted an assessment of the integrity for the tank as described in 40 C.F.R. § 265.191? If so, please state the date this assessment was completed and provide a copy of the assessment.
  - f. If it is a “new tank system” as defined in 40 C.F.R. § 260.10, has the Facility certified the design for the tank as described in 40 C.F.R. § 265.192(g)? If so, please state the date this certification was completed and provide a copy of the certification.
  - g. Please state whether or not the Facility has provided methods for secondary containment and release detection for the tank in accordance with 40 C.F.R. § 265.193. If it has, please state the date(s) these methods were first provided and a detailed description of each method.
  - h. State whether or not the Facility conducts inspections of the tank. If inspections are conducted, please indicate:
    - i. State how often the inspections are conducted.
    - ii. Provide inspection records for the tank from January 1, 2013 to the date you receive this letter.
    - iii. For the dates where no inspection record was provided in your response to Question 4.h.ii, please state whether or not an inspection was completed.
5. During the August 17, 2016 EPA CEI, the EPA inspectors observed three hazardous waste tanks that were out of service. Please refer to Photo #27 of the CEI report included as Attachment A. With regards to the three out of service, please answer the following information:
- a. State the amount (weight and volume) of material accumulated in each tank at the time of the EPA CEI.
  - b. State the exact volume (gallons) of each tank.



- c. The date of installation for each tank.
  - d. State the date on which such contents were first placed into the tank and state the basis of your knowledge. If an exact date cannot be determined, estimate the generation month and year.
  - e. State whether or not the Facility has provided methods for secondary containment and release detection for the tank in accordance with 40 C.F.R. § 265.193. If it has, please state the date(s) these methods were first provided and a detailed description of each method.
  - f. State whether or not the Facility conducts inspections of the tank. If inspections are conducted, please indicate State how often the inspections are conducted; and provide inspection records for the tank from January 1, 2013 to the date you receive this letter.
  - g. State whether or not a “waste determination” and “LDR determination” was made for the content accumulated in each tank.
  - h. If a “waste determination” was made for the material in each tank, state whether the waste determination was based on analytic results or on the generator’s knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator’s knowledge, provide a narrative explanation of the scientific basis for each determination, and provide any supporting documentation.
  - i. Was the content of each tank determined to be “hazardous waste?” If so, please state the specific EPA Hazardous Waste Code(s) associated with such waste streams that were determined to be hazardous waste.
  - j. If the content of each tank was removed from the tank and shipped off-site, submit copies of all bills of lading, manifests (hazardous and non-hazardous), removal invoices, shipping invoices, and LDR notices/certifications that accompanied each off-site shipment.
  - k. If the content(s) of the tank still remains on-site, please state where such contents are currently located within the Facility and how such contents are currently being managed.
6. During the August 17, 2016 EPA CEI, the EPA inspectors observed an unlabeled black 55-gallon drum that contained approximately 5-gallons of material located in the Hazardous Waste 90-Day Area. Please refer to Photo #29 of the CEI report included as Attachment A. With regards to the 55-gallon drum in the Hazardous Waste 90-Day Area, please answer the following:

- a. Provide a detailed description of the process or processes that generated the content of the container, and please provide a detailed description of the content of the container.
  - b. Provide the date on which the content of the container was generated and state the basis of your knowledge. If an exact date cannot be determined, please estimate the generation month and year.
  - c. Please state the amount (weight and volume) of material in the container at the time of the EPA CEI.
  - d. State whether or not a “waste determination” and “LDR determination” were made for the content of the container.
  - e. If a “waste determination” was made for the content of the container, state whether the waste determination was based on analytic results or on the generator’s knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator’s knowledge, provide a narrative explanation of the scientific basis for each such determination, and provide any supporting documentation.
  - f. Was the content of the container determined to be “hazardous waste?” If so, please state the specific EPA Hazardous Waste Code(s) associated with the content of the container that was determined to be hazardous waste.
  - g. If the content of the container was shipped off-site, submit copies of all bills of lading, manifests (hazardous and non-hazardous), shipping invoices, and LDR notices/certifications that accompanied the off-site shipment of the waste.
  - h. If the content of the container still remains on-site, please state where such contents are currently located within the Facility and how such contents are currently being managed.
7. During the August 17, 2016 EPA CEI, the EPA inspectors observed 13 containers located in the Bone Yard Lower 40 Warehouse. Each of the containers were filled with material, some were labeled with original product labels, and 4 of the containers did not have any labels. Please refer to Photo #30 of the CEI report included as Attachment A. With regards to the containers accumulated in the Bone Yard Lower 40 Warehouse, please answer the following:
- a. Provide a detailed description of the process or processes that generated the content of each container, and please provide a detailed description of the content of each container.



- b. Provide the date on which the content of each container was generated and state the basis of your knowledge. If an exact date cannot be determined, please estimate the generation month and year.
  - c. Please state the amount (weight and volume) of material in each container at the time of the EPA CEI.
  - d. State whether or not a “waste determination” and “LDR determination” were made for the content of each container.
  - e. If a “waste determination” was made for the content of each container, state whether the waste determination was based on analytic results or on the generator’s knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator’s knowledge, provide a narrative explanation of the scientific basis for each such determination, and provide any supporting documentation.
  - f. Was the content in each container determined to be “hazardous waste?” If so, please state the specific EPA Hazardous Waste Code(s) associated with the content of each container that was determined to be hazardous waste.
  - g. If the content of each container was shipped off-site, submit copies of all bills of lading, manifests (hazardous and non-hazardous), shipping invoices, and LDR notices/certifications that accompanied each off-site shipment of the waste.
  - h. If the content of each container still remains on-site, please state where such contents are currently located within the Facility and how such contents are currently being managed.
8. With respect to the VSI’s hazardous waste training program:
- a. Provide the first and last name of each employee at the Facility who is or has been responsible for the handling and/or management of hazardous waste for the time period of January 1, 2013 up to the present. This would include, but not be limited to, persons responsible for the labeling, dating, inspecting, and transporting containers of hazardous waste, in addition to the signing of manifests and LDR notices, waste determinations, emergency coordinators, and hazardous waste training instructors.
  - b. Provide the exact dates of employment for each of the employee names provided in your response to Question 8.a. above.

9. Please state "yes" or "no" to the following question: Does the Facility maintain documentation specifying the job title and job description for each employee listed in response to Question 8.a? If "yes", please answer the following:
- a. Submit the Facility's documented job titles and written job descriptions for each employee listed in response to Question 8.a. for the time period of January 1, 2013 up to the present.
  - b. For each document submitted in response to Question 9.a, above, provide the date each such document was first created by the Facility.
10. Please state "yes" or "no" to the following question: Has the Facility provided initial hazardous waste training to each employee listed in response to Question 8.a? If "yes", please answer the following:
- a. Provide the dates on which initial hazardous waste training was conducted for each of the employees listed in response to Question 8.a. for the time period of January 1, 2013 up to the present and state the basis of your knowledge.
  - b. Submit any and all records the Facility has maintained to document initial hazardous waste training has been conducted for each employee named in response to Question 8.a. for the time period of January 1, 2013 up to the present.
11. Please state "yes" or "no" to the following question: Has the Facility provided annual refresher hazardous waste training to each employee listed in response to Question 8.a? If "yes", please answer the following:
- a. Provide the dates on which annual refresher hazardous waste training was conducted for each of the employees listed in response to Question 8.a. for the time period of January 1, 2013 up to the present and state the basis of your knowledge.
  - b. Submit any and all records the Facility has maintained to document annual fresher hazardous waste training has been conducted for each employee named in response to Question 8.a. for the time period of January 1, 2013 up to the present.

A copy of the August 17, 2016 CEI report documenting the findings of the inspectors is enclosed as Attachment A for your information, and includes only those attachments not provided by the facility representative(s) at the time of or subsequent to the inspection.

The provisions of Section 3008 of RCRA, 42 U.S.C. § 6928, authorize EPA to pursue penalties for failure to comply with or respond adequately to an information request under Section 3007(a) of RCRA. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil or criminal proceedings.



With regard to the Small Business Regulatory Enforcement and Fairness Act ("SBREFA"), please see the "Information for Small Businesses" memo, enclosed as Attachment B, which might be applicable to your facility. This enclosure provides information on contacting the SBREFA Ombudsman to comment on federal enforcement and compliance activities and also provides information on compliance assistance. As noted in the enclosure, any decision to participate in such program or to seek compliance assistance does not relieve your facility of its obligation to respond in a timely manner to an EPA request or other enforcement action, create any rights or defenses under law, and will not affect EPA's decision to pursue an enforcement action. To preserve your facility's legal rights, you must comply with all rules governing the administrative enforcement process. The Ombudsman and fairness boards do not participate in the resolution of EPA's enforcement actions. EPA has not made a determination as to whether or not your facility is covered by SBREFA.

Your facility is entitled to assert a claim of business confidentiality covering any part or all of the information submitted, in a manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a claim of business confidentiality is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to your facility.

This request for information is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

Your response must include the following signed and dated certification:

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: \_\_\_\_\_  
Name: \_\_\_\_\_  
Title: \_\_\_\_\_

Please send your response to:

Andrew Ma  
US EPA Region III  
Environmental Science Center  
701 Mapes Road  
Fort Meade, MD 20755-5350

If you have any questions concerning this matter, please contact Mr. Andrew Ma at (410) 305-3429.

Sincerely,

A handwritten signature in black ink that reads "Carol Amend". The signature is fluid and cursive, with the first name "Carol" and last name "Amend" clearly distinguishable.

Carol Amend, Associate Director  
Land and Chemicals Division  
Office of Land Enforcement

Enclosures

cc: A. Ma (3LC70) w/o